



U.S. Department of Justice

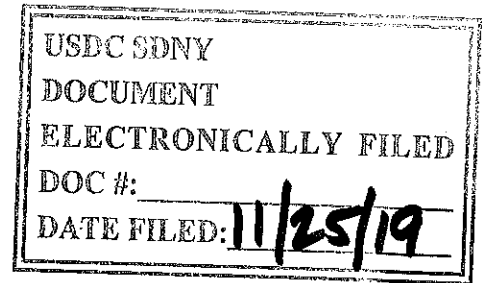
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 25, 2019

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED



Re: United States v. Barry Connell, 17 Cr. 116 (RMB)

Dear Judge Berman:

Defendant Barry Connell is scheduled to be sentenced in the above-referenced case on December 5, 2019 at 11:00 a.m. The Government writes to submit the enclosed letter application on behalf of the Securities and Exchange Commission (the "SEC"), which has a pending civil action against Connell. *See SEC v. Connell*, No. 17 Civ. 831 (LGS). As the SEC's letter explains, the SEC requests permission to approach counsel's table after the sentencing in order to have Connell review and sign a document needed in the settlement of the civil action. The SEC's letter indicates that Connell, through counsel in the instant criminal case, consents to the SEC's request; the Government likewise consents.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Won S. Shin
Won S. Shin
Assistant United States Attorney
(212) 637-2226

Mr. Siegel is requested to go over these materials with Mr. Connell prior to Dec. 5, 2019. Thanks.

cc: Jesse M. Siegel, Esq.

SO ORDERED
Date: 11/25/19 Richard M. Berman
Richard M. Berman, U.S.D.J.



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
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November 22, 2019

VIA ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17B
New York, NY 10007-1312

Re: USA v. Connell, 17-cr-00116-RMB-1 and SEC v. Connell, 17-cv-00831-LGS

Dear Judge Berman:

I write as counsel for Plaintiff Securities and Exchange Commission (the "SEC") in the above-referenced civil action, which is parallel to the above-referenced criminal action before Your Honor. I write to request a special accommodation at the conclusion of the sentencing hearing set for December 5, 2019 at 11:00 a.m.

After Mr. Connell's sentencing is completed, I request permission to approach counsel's table with my SEC colleague Jonathan M. Grant, and ask Mr. Connell to review and execute a five-page consent in the civil matter that is required for the proposed settlement of that action. I expect that this would take no longer than five to ten minutes. Mr. Connell's criminal attorney, Jesse M. Siegel, suggested this approach and has indicated that Mr. Connell has already reviewed the consent and intends to sign the document.

Because Mr. Connell is not represented in the civil matter, obtaining his signature otherwise would be difficult and likely require visiting him in prison. Thus, I respectfully request the brief opportunity to have Mr. Connell sign the consent after the sentencing hearing.

Respectfully submitted,

/s/Dugan Bliss

Dugan Bliss